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Bruce D. Kenyon
President - Generation Group

October 2, 2001

Mr. Lake H. Barrett
Acting Director
Office of Civilian Radioactive Waste Management
Department of Energy
Washington, DC 20585

Dear Mr. Barrett:

I am writing in response to your August 27, 2001 letter to express my views regarding the contemplated disposal of high level waste at Yucca Mountain. This issue has enormous safety and importance to the nuclear industry, particularly in light of the recent terrorist attacks. Despite the overwhelming scientific evidence supporting the approval of Yucca Mountain as the Nation's high level waste disposal site, we as a country are still debating the merits. It is time for action.

Northeast Utilities nuclear history

Northeast Utilities has been involved in the nuclear business since Yankee Atomic in Rowe, Massachusetts began construction in 1957, some forty-four years ago. As a co-owner of that unit and as an operator or owner of seven additional nuclear plants, we have many years of experience in this industry. Although we are exiting the nuclear generation business due to state restructuring mandates, we are still a co-owner of three units that are currently undergoing decommissioning: Connecticut Yankee, Maine Yankee, and Yankee Rowe. Each of these plants is on a single unit site, and the spent fuel issue is far and away of greatest safety and financial significance.

Sound science supports Yucca Mountain site recommendation

The Department of Energy (DOE) has spent nearly two decades characterizing the Yucca Mountain site, which has become the most extensively studied piece of land on earth. A draft Environmental Impact Statement (EIS) of the proposed repository was issued in 1999, and the repository was projected to have essentially no adverse effect on public health and safety. The 1999 draft EIS indicated that radiation levels associated with the repository 10,000 years in the future would be less than 1% of naturally occurring background. It was then thought to be likely that real impacts would be even smaller. In the supplement EIS issued in 2001, the DOE found that it's projections were in fact very conservative. The supplement study showed that there will be no radiation exposures for 10,000 years and, even over a million years, peak radiation levels associated with the repository will be well below natural background and substantially less than projected in the draft EIS.

Yucca Mountain's suitability as a nuclear fuel repository was among the most comprehensive scientific investigations ever conducted. The recently issued DOE Science and Engineering Report involved thousands of scientists collecting a massive body of data, designing engineered barriers to augment the site's dry, stable geology, and refining ever more sophisticated computer models to project the repository's future performance. The $6 billion cost for this effort concluded that spent fuel could be stored safely for the many thousands of years that are necessary. Let us not forget that Yucca Mountain's remote desert location, on the western border of a Nevada nuclear weapons test site, will never be habitable, whether we store spent fuel there or not.

Even with this overwhelming scientific evidence, the approval process was unjustifiably delayed due to the State of Nevada declining to issue environmental permits needed for drilling boreholes and digging trenches. This impediment was overcome through several court cases involving the DOE and Nevada.

Many distinguished organizations support the Yucca Mountain site

Since the 1950s, scientific organizations around the world have examined the issue of radioactive waste management. Most organizations - from the National Academy of Sciences and the Office of Technology Assessment in the United States to the International Atomic Energy Agency (IAEA) and the Organization for Economic Cooperation and Development's Nuclear Energy Agency (OECD/NEA) - have reached the same conclusion. They believe that the best and safest long-term option for dealing with high-level radioactive waste is deep geologic disposal such as that available at Yucca Mountain.

The Yucca Mountain site provides substantial protection against terrorist attacks

The terrorist attacks on September 11th have further elevated the high priority of this issue. By storing spent fuel at some 70 nuclear sites, our nation has seventy more targets of greater attractiveness to the terrorist community than should be the case. For this reason alone, it has become of utmost importance to consolidate the nation's commercial spent nuclear fuel to one well-designed, guarded and protected location. This alternative, with its highly secure design features and characteristics, is far more desirable for the safety of the entire population of the United States.

The protection and security of our spent fuel is of great importance to the health and safety of the public. While our democratic process is the envy of the world, the cost/benefit analysis in this instance is crystal clear. It is time to conclude the protracted deliberative process, and act.

Nuclear plants are running out of storage space

The Nuclear Waste Policy Act of 1982 and its 1987 amendments authorize the DOE to locate, build and operate a deep, mined geologic repository for high-level waste and a facility for interim storage of spent fuel by January 31, 1998, as well as a transportation system that safely links U.S. nuclear power plants, the interim storage facility and the permanent repository. No site has been selected for an interim storage facility, and the federal government defaulted on this long-standing obligation to begin moving spent fuel from the nation's nuclear plants by January 1998. The lack of a repository has placed nuclear power plants in the position of storing more spent fuel than expected for longer than originally intended. The result is that many nuclear plants - which each produce an average of about

553533

20 metric tons of spent fuel annually - are running out of storage capacity. By the end of 2006, about 60 units will have no more storage space in their spent fuel pools, and by the end of 2010, an additional 18 will have exhausted their storage capacity.

Site recommendation is good policy

The Yucca Mountain site-recommendation is substantiated by scientific facts as well as being good for the country. Nuclear energy supplies 20% of the electricity generated in the U. S. without emitting any air pollutants or greenhouse gases. As we have seen recently with problems of high demand and low supply of generation, this resource is vital to the nation's overall energy mix. In addition, the high level waste generated for the production of electricity is just a fraction of what has already been produced by the U. S. Defense Department, so that the issue of what to do with high-level waste would have to be dealt with even if there was no commercial nuclear power generation.

Summary

My hope is that the construction of a high level waste repository will be built at Yucca Mountain in a safe and expeditious manner, as intended and required by the Nuclear Waste Policy Act of 1982. The electric industry and its customers invested in nuclear plants based on this expectation, and have provided ample funding for this purpose. Until a repository is ready to accept spent fuel from nuclear power plants, a centralized interim storage facility must be made available to the commercial nuclear industry. This facility would provide added safety and security by using a single dedicated site. It is time for our federal government to demonstrate its immense capability in this area, and provide added safety and security for the benefit of all the citizens of the United States of America.

Sincerely,

Bruce Kenyon

3